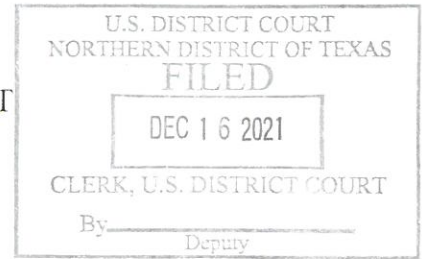


ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

No. 4:21-MJ- 833

JONATHAN DONALD REYNOLDS (01)

CRIMINAL COMPLAINT

I, Task Force Officer Gustavo Ceron, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about September 23, 2021, in the Fort Worth Division of the Northern District of Texas, defendant, **JONATHAN DONALD REYNOLDS**, did attempt to acquire a firearm, from a licensed dealer, by knowingly making a false or fictitious written statement at NTX Lead Heads LLC located at 1029 N. Saginaw Blvd F6, Saginaw, Texas, in violation of Title 18, United States Code, Section 922(a)(6).

Probable Cause:

I am a Task Force Officer with the Federal Bureau of Investigation (FBI) and have been so since 2019. I am currently assigned to the Fort Worth Field Office in the Dallas Field Division. I am currently assigned to investigate terrorism-related offenses and violent offenses, including violations of 18 USC § 922. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief, but are not inclusive of all evidence or information in the case.

1. On June 29, 2021, the City of Arlington, Texas attorney's office received documents from JONATHAN DONALD REYNOLDS (REYNOLDS) requesting \$5000.00 from Officer Christopher Abernathy #2973. The documents appeared to possibly be a lien that was filed out of state, in Illinois. The Arlington Police Department (Arlington PD) database showed that Officer Abernathy, badge #2973, while assigned to the Community Action Team (CAT), made a traffic stop on REYNOLDS on June 2, 2021 for displaying an expired Illinois license plate ZU85920. While Abernathy was speaking with REYNOLDS on the traffic stop, REYNOLDS advised he provided a

US passport to Officer Abernathy due to him having a national right to travel. Upon review of the officer's body worn camera footage, REYNOLDS appears to be a sovereign citizen based on the rhetoric used. Officer Abernathy issued REYNOLDS citations.

2. REYNOLDS was interviewed by FBI Task Force Officer (TFO) Casey Brashear on August 18, 2021. During that interview, REYNOLDS admitted to filing the false lien on Officer Abernathy. This information was turned over to Arlington PD Criminal Investigation Division (CID) who contacted the Tarrant County District Attorney's Office (Tarrant County DA). The Tarrant County DA's Office advised that because an actual lien was not filed against Officer Abernathy, a charge of felony retaliation would not be met and, therefore, the case would not be accepted.
3. On September 10, 2021, the Arlington Police Department Warrant Unit mailed REYNOLDS a letter to notify him of the existence of warrants for his arrest to REYNOLDS home address of 240 Buie Drive, Everman, Texas. The warrants were for June 2, 2021 traffic citations which REYNOLDS had not addressed.
4. On September 17th, 2021, Arlington Police Warrant Unit received a certified United States Postal Service letter from REYNOLDS stating, "For I am, with full faith and credit, upon the honor; public affirmation or oath of office and bond of man and woman doing business as; for Arlington Municipal Court with intention to be in compliance with rules of conduct. If I the man known as Jonathan Reynolds sometimes doing business as JONATHAN REYNOLDS; who is the man or woman, or any one of the people acting as public servants for or on behalf of Arlington Municipal Court with intention to trespass on property by use of exertion; being in non-compliance with Eighth Article of the Bill of Rights in the constitution of the united states of America? Who is the man or woman acting as public servant for on the behalf of Arlington Municipal Court with intention to trespass on property by way of exertion?"
5. On November 17, 2021, TFO Brashear conducted a NCIC wants and warrants check on REYNOLDS and located a NICS denied transaction dated 09/23/2021, which means he was denied the purchase of a firearm, approximately one month after TFO Brashear last spoke with REYNOLDS. TFO Brashear contacted an FBI NICS liaison who advised that the subject, Jonathan Donald REYNOLDS, was denied by NICS on 9/23/21 on a disqualifying Illinois record, under IL52316930, which was marked with a Disqualification for Firearms Flag. The NICS records shows that REYNOLDS attempted to purchase a firearm from FFL Dealer NTX Lead Heads LLC, located at 1029 N Saginaw Blvd, Suite F6, Saginaw, TX 76179, Phone: (682)224-5531.
6. On November 17th, 2021, FBI TFO Joseph Mokos (ATF) contacted the FFL dealer listed above who provided a copy of REYNOLDS ATF Form 4473. On the form, REYNOLDS marked that he has never been convicted of a felony offense and that he was not currently a fugitive from justice. The FFL dealer also provided a copy of REYNOLDS Texas CDL Driver's license that was provided at the time of the attempted purchase.

7. On November 18th, 2021, TFO Brashear interviewed the FFL dealer, who advised that REYNOLDS came into the FFL shop and attempted to purchase a Glock 17, 9mm, handgun with serial number BSWB404. The FFL dealer advised he remembered REYNOLDS due to his acting surprised when he was denied the purchase of the firearm. The FFL dealer stated that REYNOLDS advised he didn't understand what the denial was for due to his holding a Texas Commercial Driver's License. The FFL dealer provided appeal paperwork to REYNOLDS and the appeal process was explained. The FFL dealer stated that REYNOLDS never contacted them during the 30 day appeal window. When filling out the ATF Form 4473, REYNOLDS provided a phone number of 773-981-4993.
8. The Glock 17, 9mm, handgun with serial number BSWB404, was manufactured outside the state of Texas and, therefore, would have had to move in, and affect interstate commerce, to reach the state of Texas.
9. I, thereafter, confirmed through a review of the criminal history of REYNOLDS, that REYNOLDS was convicted of Robbery in which he was sentenced to three (3) years in prison on August 22, 2006. In addition, on November 08, 2005, REYNOLDS was found guilty and sentenced to one year probation for a charge of IVC Felonies out of Cook County, IL.

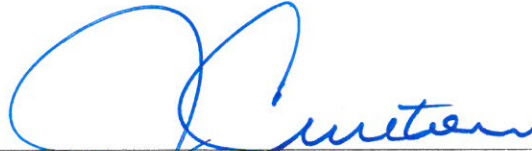
Conclusion:

1. Based upon the above facts and circumstances, I respectfully submit that there is probable cause to believe that **JONATHAN DONALD REYNOLDS** attempted to acquire a firearm from a licensed dealer, by knowingly making a false or fictitious written statement, at NTX Lead Heads LLC located at 1029 N. Saginaw Blvd F6, Saginaw, Texas, in violation of Title 18, United States Code, Section 922(a)(6).



Gustavo Ceron
Task Force Officer
Federal Bureau of Investigation

SWORN AND SUBSCRIBED before me, at 2:30 am/pm, this 16th day of December, 2021.



JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE